

# **CALIFORNIA ENVIRONMENTAL QUALITY ACT**

## **SPECIAL INITIAL STUDY**

*The Department of Toxic Substances Control (DTSC) has completed the following Special Initial Study for this project in accordance with the California Environmental Quality Act (§ 21000 et seq., California Public Resources Code) and implementing Guidelines (§15000 et seq., Title 14, California Code of Regulations). This Special Initial Study has also been used to satisfy the requirements of 711.4, Fish and Game Code and 753.5, Title 14, Code of California Regulations relating to filing of environmental fees.*

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### **I. PROJECT INFORMATION**

**Project Name: Former Macy Street Site, Los Angeles, California Removal Action Workplan**

**Site Location: The Site is located between Cesar Chavez Avenue on the northeast, the Rapid Transit District bus overpass on the southwest, the Los Angeles River to the southeast, and Keller Street to the northwest in the City of Los Angeles, Los Angeles County, California.**

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Project Description:

### **INTRODUCTION**

The proposed removal action project is being implemented under the direction of the State of California Environmental Protection Agency (Cal EPA), Department of Toxic Substances Control (DTSC) pursuant to Health and Safety Code Section 25355(a)(1). The project involves removal of contaminated soils in accordance with the methods and procedures presented in the Removal Action Workplan (RAW) (TRC,

2002) at the former Macy Street Site (Site). The goal of the RAW is to describe the polynuclear aromatic hydrocarbon- (PAH-) and total recoverable petroleum hydrocarbon- (TRPH-) contaminated soil remediation activities to be conducted at the Site.

The removal action measures for the project involve the excavation, removal, and transportation of PAH and TRPH contaminated soils that are above the cleanup/removal goals or to a maximum depth of 10 feet bgs and treatment of the contaminated soils at an offsite thermal treatment facility. The estimated volume of soil to be remediated is 8,700 cubic yards or, assuming a unit weight of 1.5 tons per cubic yard, 13,050 tons. Soils impacted by other constituents of concern such as benzene and metals do not exceed the cleanup goals and, therefore, are not anticipated to result in the removal of significant additional volumes of soils. Following the removal of the contaminated soils, the Site will be backfilled, graded and compacted. The schedule to complete remediation and Site restoration activities is estimated at 2.5 to 3.0 months.

The principal objective of the proposed removal action is the removal of contaminated soils from the Site to a level necessary to protect human health and the environment (i.e., based on the results of the Human Health Risk Assessment [HHRA]). This involves the excavation of contaminated soils to a depth of up to 5 to 10 feet below grade as required to prevent human exposure to constituents of concern (COCs) above applicable health-based cleanup goals. It is anticipated that this removal action would constitute an initial cleanup phase, which could incidentally satisfy the objective of mitigating potentially adverse future impacts to underlying groundwater (i.e., from potential soil sources).

Investigation and remediation of the Site are being performed under the oversight of the DTSC. DTSC is providing oversight services under Cleanup Agreement Docket No. HAS95/96-012 with the Project Proponent, The Atchison Topeka and Santa Fe Railway Company (which became The Burlington Northern and Santa Fe Railway Company [BNSF] in 1996).

## **SITE DESCRIPTION AND BACKGROUND**

The Site is an approximately rectangular 2-acre parcel of land located in downtown Los Angeles, California, between Keller Street on the northwest and the Los Angeles River on the southeast. Active rail tracks run along the southeast side of the Site. The Piper Technical Center building (555 Ramirez Street) is located adjacent to the Site on the northwest side of Keller Street. The overpass for Macy Street (now Cesar E. Chavez Avenue) and the Rapid Transit District (RTD) bus overpass form the northeast and southwest boundaries of the Site, respectively.

The Site was initially developed in the mid-to late-1800s for commercial and industrial use and has included such activities as a piping supply facility, furniture and agricultural implements warehousing, pickle and vinegar manufacturing, beer brewing, manufactured gas plant operations and railroad siding loading/unloading station. The Site has been essentially vacant since the 1970s. BNSF, the prior property owner, sold it to the Los Angeles County Metropolitan Transportation Authority (MTA) in 1992.

The Site is zoned as "M3-1" (heavy industrial) and is currently owned by the MTA. The MTA leases a portion of the southern end of the Site to the City of Los Angeles Police Department (LAPD). The LAPD uses the area for a police car salvage lot and parts storage area. The LAPD storage lot is paved and

fenced. The remaining portion of the Site has been used in the past few years by Caltrans as a materials laydown area for bridge retrofit work on the adjacent Santa Ana Freeway and busway overpass and Cesar E. Chavez Avenue overpass, and is covered with asphalt pavement that is in a weathered condition.

## NATURE AND EXTENT OF CONTAMINATION

From August 1990 to March 2000, initial and supplemental site assessment activities were conducted at the Site, during which borings were drilled and groundwater monitoring wells were installed (TRC, 1994 and 2000). Results from assessment activities involving soil sampling and groundwater monitoring/sampling include the following:

- A total of 43 soil borings have been performed at the Site.
- Total PAH concentrations ranged from ND (<0.01 mg/kg) to 929 mg/kg. Low levels of VOCs were found in some of the soil samples collected from the borings. Most of the soil contamination is from TRPHs in the diesel to fuel oil range. The concentration of the TRPHs ranged from ND (<10 mg/kg) to 26,100 mg/kg.
- Groundwater monitoring wells MW-1, MW-2 and MW-3 were installed in 1997.
- VOCs detected in the groundwater have included benzene, toluene, ethylbenzene, xylenes (BTEX), MTBE, cis-1, 2-dichloroethylene (cis-1, 2-DCE), vinyl chloride, trichloroethene (TCE), 1,1-dichloroethane (1,1-DCA), n-propylbenzene and isopropyl benzene. PAHs detected in the groundwater have included acenaphthylene, anthracene, chrysene, phenanthrene, acenaphthene, benzo(a)anthracene, dibenzo(a,h)anthracene, fluoranthene, naphthalene, and pyrene. Metals detected in the groundwater included arsenic, barium, chromium, cobalt, copper, nickel, selenium, vanadium and zinc. Concentrations of these materials are summarized in the *Remedial Investigation (Revised)* Report dated June 2001, by TRC (TRC, 2001).

A thin layer (possibly 1/2 to 2 inches thick) of free product has been found in well MW-1 during previous sampling events. The free product layer was removed by purging prior to sampling during the previous sampling events. MW-2 and MW-3 have not shown a free product layer in prior monitoring events. Shallow groundwater sampled at the three onsite monitoring wells is for the most part contaminated by sources likely situated upgradient from the Site and unrelated to historic or current land uses at the Site with the exception of the former adjacent manufactured gas plant and butadiene facilities. The presence of MTBE, a recent additive to gasoline, and chlorinated hydrocarbons further supports the assertion that the observed groundwater impacts are largely a regional condition. This shallow groundwater is not currently used for drinking. It is very unlikely that the shallow groundwater will be used as a drinking water supply in the future.

The Site groundwater monitoring and sampling event for the first quarter of 2002 indicated that the depth to groundwater ranged from 30.82 to 31.05 feet below grade (fbg). The groundwater flow direction was to the south at a gradient of 0.008 foot per foot.

The TRPHs-impacted soils greater than 1,000 mg/kg are primarily located in an area extending from the southwestern corner of the Site, northeasterly toward the retaining wall which is located along the east side of the Site. In the near-surface soils (i.e., nominal 2.5-foot depth), this impacted area is roughly 70 feet wide by 200 feet in length. The depth of the TRPHs extends somewhat uniformly from the surface to depths of 5 to 10 feet with some deeper impacted areas extending to depths of 25 to over 30 feet (i.e., borings B-15, MW-1 and MW-2).

Two small TRPHs-impacted areas greater than 1,000 mg/kg are located in the northern portion of the Site (see Figure 5.1). One area, located around Boring B-42, is adjacent to Keller Street. The lateral extent of this area is not well defined but would be limited to within the boundaries defined by Borings B-9 and B-10. The TRPHs appear to be limited to within 5 feet of the ground surface in this area. The other area is located at the northern end of the Site around Boring B-33. The lateral extent of TRPHs in this area is also not well defined but would be limited in the southerly direction by Boring B-32. The northern boundary of this impacted area is likely limited by the Cesar E. Chavez Avenue overpass (formerly Macy Street) as soils have been extensively excavated under the overpass through the years by construction projects unrelated to the Site. The TRPH-impacted soils appear to extend to over 10 feet in depth in this area (e.g., around Boring B-33).

PAH-impacted soils greater than 100 mg/kg are located in four areas across the Site (see Figure 5.1). One PAH-impacted area identified is located in the northern portion of the Site, in the area of Boring B-42 and adjacent to Keller Street. This area is also impacted with TRPHs. The lateral extent of PAH-impacted soils is not well defined but would be bounded by Borings B-27 and B-41. The PAH-impacted soils appear to be limited to within 5 feet of the ground surface in this area.

Three areas of PAH-impacted soils greater than 100 mg/kg are located in the southern half of the Site (see Figure 5.1). One area is located around Boring B-21, and partially overlaps with the TRPH-impacted soils in this area. In the near-surface soils (i.e., nominal 2.5-foot depth), the area is roughly 20 to 30 feet in width by approximately 60 feet in length. The lateral extent of the PAHs in this area is reasonably well-defined onsite but unknown offsite, especially to the west. PAH-impacted soils extend to depths greater than 10 feet in this area.

The area of PAH-impacted soils around Borings B-14 and B-30 appears to be located within the larger TRPH-impacted area. The lateral extent is reasonably well defined except in the southwesterly direction. The lateral extent of PAHs in the southwest direction may be limited by Boring B-16. The PAH-impacted soils appear to be limited to within 5 feet of the ground surface in this area.

The third PAH-impacted area in the southern portion of the Site is near Boring B-24 and the former above ground storage tank (AST). The lateral extent of PAHs is not well defined but would be limited to the area defined by Borings B-5, B-29 and B-41. The PAH-impacted soils appear to be limited to within 5 feet of the ground surface in this area.

## CLEANUP GOALS

An HHRA was performed as part of the remedial investigation activities to assess the potential risks to public health associated with contaminants identified at the Site, and to calculate health-based cleanup goals.

The Site area has been developed for heavy industry and commercial use since the 1880s. Based on a regional study in 1991, there are approximately 48,000 people within one mile of the nearby RTD busway. Based on a study of the local population density, approximately 47 persons reside within one-quarter mile of the Site (Claritas, Inc. *Demographic Snapshot Report, Keller Street and Ramirez Street, 0.25-mile radius, Los Angeles, California*. 2002).

Health risks were evaluated in the HHRA for current nearby (offsite) residents (i.e., on the other side of RTD busway, Santa Ana Freeway, and Cesar E. Chavez Avenue) and current visitors onsite (i.e., LAPD workers storing or retrieving vehicles or equipment). Potential future receptors included future industrial/commercial workers at the Site following redevelopment. Although the likelihood of future residential development is very low at this Site, potential future (onsite) residents were included as potential future receptors for the purposes of the HHRA, in accordance with DTSC recommendations.

Given the limited population within one-quarter mile of the Site, the nonresidential nature of the project area, and the limited number of potential receptors likely to be present at the Site (i.e., future industrial and construction workers), the DTSC Risk Manager has selected  $10^{-5}$  as an appropriate risk level. This risk level is consistent with EPA protocol and DTSC guidelines for the assessment of contaminated sites. Adoption of this acceptable risk threshold is further supported by the application of conservative health protective assumptions throughout the HHRA.

Proposed cleanup goals are summarized in Table 1 for soils in the depth ranges of 0 to 5 fbg and 5 to 10 fbg. These proposed cleanup goals are based on those calculated for an acceptable risk threshold of  $10^{-5}$  under a future industrial worker or future construction worker scenario, respectively. Where the calculated cleanup goal exceeds the corresponding hazardous waste criteria threshold specified in California Code of Regulations (CCR) Title 22, February 2002, the proposed cleanup goal defaults to the applicable total threshold limit concentration (TTLC) value.

The soil cleanup goal for carcinogenic PAHs (as Total Equivalent B(a)P) in the depth range of 0 to 5 feet is 1.7 mg/kg, which is consistent with cleanup goals established for similar former manufactured gas plant sites. This cleanup goal is also near background levels based on a study performed by ENVIRON Corporation (TRC, 2002). The ENVIRON study included the collection of 184 background soil samples from the vicinity of manufactured gas plants in Southern California. A statistical evaluation of the background data presented in the study document shows that the 95% upper confidence level of the mean is 0.24 mg/kg, the 95<sup>th</sup> percentile of the data set is 0.9 mg/kg, and the range of background values is 0.0008 to 4.1 mg/kg.

The cleanup goal for benzene was determined by modeling the indoor air concentration (i.e., in a potential future residential/commercial structure) for which a risk of  $10^{-5}$  would apply, and then calculating the corresponding soil benzene level which would result in this indoor air concentration (i.e., through

diffusion processes in the vadose zone). The Johnson & Ettinger (1991) model used for the determination of a soil benzene cleanup goal was recommended by DTSC and the USEPA.

The proposed removal action goal for TRPH is not a health-based cleanup goal since TRPHs do not pose a significant health risk. There are no federal, state of California or local regulations that promulgate acceptable concentrations or cleanup goals for TRPH in soil. Similarly, there are no threshold levels establishing hazardous waste criteria for TRPH (e.g., TTLC, soluble threshold limit concentration [STLC] in CCR Title 22), nor are there toxicity criteria for TRPH which could allow for the calculation of potential human health risks. Rather, the quantitative assessment of human health risks associated with potential exposure to TRPH in Site soil is incorporated in the consideration of health risks posed by exposure to TRPH constituents (e.g., PAH, metals, BTEX, etc.), and thus accounted for in the cleanup goals proposed for these constituents. The proposed removal action goal for TRPH is based on future construction and development activities (i.e., to a depth of approximately 10 fbg). For example, these future activities may require the offsite disposal of TRPH-impacted soils, for which a threshold of 1,000 mg/kg is typically invoked.

Contamination will only be removed during this phase of Site remediation down to a maximum depth of 10 feet bgs.

## **PROPOSED REMOVAL ACTIVITIES**

### Sequence of Work

Construction activities for excavating and handling the PAH- and TRPH-impacted soils shall correspond to the following general sequence:

- Perform survey to confirm property line.
- Establish traffic control, Site security, and Site access.
- Establish erosion, sediment and dust control measures.
- Removal of existing structures (i.e., railroad team tracks, fences, pavement) and abandonment of monitoring wells MW-1 and MW-2.
- Mobilization of excavator/backhoe and haul trucks.
- Installation of shoring along eastern side of Keller Street.
- Excavation, stockpiling, loading, and hauling of impacted soils.
- Confirmation sampling.
- Additional investigation and removal activities, as necessary.
- Backfilling, compaction, and re-grading of excavated areas.
- Installation of new monitoring wells.
- Offsite treatment of impacted soils (may occur concurrently with other activities).

Confirmation soil samples will be taken at the excavation limits and the excavation bottom. Based on the confirmation soil sampling results, limited over-excavation shall be performed at locations containing PAH and TRPH concentrations in soil in excess of the cleanup/removal goals.

Excavation will progress from the smaller impacted areas located in the northeast portion of the Site (i.e., Area 1) towards the southwest corner of the Site along Keller Street (i.e., Area 6) until the initial limits of

the excavation are completed. The sequence of work shall be accomplished in two phases as illustrated in Figures 5.1 (Phase I) and 5.2 (Phase II).

### Installation of Shoring

Due to the location of TRPH- and PAH-impacted soils adjacent to the Site property boundary in the southwest corner, shoring will be installed in accordance with a building permit obtained from the City of Los Angeles. To protect the sidewalk and other improvements along Keller Street and the RTD bus overpass on the southern end of the Site, shoring will be installed along the property boundaries adjacent to impacted Areas 4 and 6. Additional shoring may be placed at the property boundary adjacent to impacted Area 2, if necessary. The shoring will be designed to allow the excavation to a total depth of 10 feet bgs in Areas 2, 4 and 6. The shoring will be of the sheet-pile or beam and lagging type. After impacted soils are removed, the shoring will be left in place during backfilling to provide a barrier between the clean backfill and impacted soils offsite.

### Removal, Stockpiling, and Loading of Contaminated Soils

Excavation is planned within the six areas shown in Figures 5.1 and 5.2. Materials will be removed in a manner to minimize damage to the adjacent structures, sidewalk, power poles and existing asphalt, which are designated to remain. It is anticipated that the excavated material may include noncontaminated soil, contaminated soil and debris. Specific areas have been identified where temporary stockpiles may be located. All excavated materials must be confined within the designated perimeters.

Prior to the excavation activities, the following plans and requirements will be implemented:

- Health and Safety Plan
- Noise Control Plan
- Odor Control Plan
- Dust Control Plan
- Stormwater Management Plan

When working in close proximity to the existing sidewalk along Keller Street, measures (e.g., temporary barricades, set-backs, silt fences) will be taken to protect the sidewalk and keep loosened dirt or construction debris from spilling onto the sidewalk.

The Exclusion, Decontamination and Support Zones will be identified and clearly marked as shown in Figures 5.1 and 5.2. The Exclusion Zone will contain the excavations, contaminated soil stockpiles and the truck loading area. The Decontamination Zone will be located immediately adjacent to the Exclusion Zone for purposes of decontaminating personnel, equipment and vehicles exiting the Exclusion Zone.

Excavation shall begin in Areas 1 and 2 (i.e., Phase I) and proceed southwest (i.e., Phase II). Soils will be excavated to the general depths identified within the areas shown in Figures 5.1 and 5.2. Soils that are identified as showing visual evidence (i.e., discoloration or staining) or are suspected of being contaminated based on field monitoring equipment readings (OVA) will also be removed.

The excavated soil will be segregated based upon type of contamination. Odor and dust control measures will be taken.

The segregated soil will be loaded into hauling trucks and transported to the approved treatment facility. Contaminated soils will be transported offsite at a rate determined by:

- The volume the treatment facility is capable of handling.
- The amount that can be transported without exceeding air quality thresholds. While other construction equipment (e.g., the excavator) is working at the Site, loading and transporting contaminated soil will be limited to 12 trucks per day. For days when no other construction equipment is operating at the Site a maximum of 16 trucks per day will be loaded with contaminated soil for transport to the recycling facility.

Mobilization to Phase II will not begin until excavation, stockpiling, loading, backfilling and compaction activities have been completed for Phase I.

#### Offsite Treatment of Contaminated Soils

Soils exceeding the removal and cleanup goals will be excavated and transported to an offsite low temperature thermal desorption unit (TDU). This facility will be fully permitted to process TRPH and PAH contaminated soils. Excavated soils received by the facility will be sampled by the facility in accordance with its operating permit prior to treatment. Upon acceptance, the contaminated soils will be processed through the TDU. Once processed, the soils will be analyzed for conformance with the cleanup standards required under the facility's operating permit. Treated soils are not planned to be reused onsite for backfill material.

#### Backfill, Compaction, and Restoration

Areas excavated as a result of removal activities shall be backfilled with approved clean soil, as discussed in the next paragraph. Import material will be hauled to the Site from an offsite source. Debris, plant matter, and other deleterious material shall not be present in soils used for fill. Backfilling and compaction of excavated areas shall be in conformance with City of Los Angeles requirements. Excavation backfill shall be placed in 8-inch thick loose lifts and each lift shall be compacted to at least ninety percent (90%) relative compaction using American Society of Testing and Materials (ASTM) Procedure D1557 guidelines. Backfilled areas shall be graded to match the existing grade.

Prior to bringing fill material onsite, the soil quality data of the source material will be reviewed. Sampling of the imported fill shall be conducted to verify the quality of the material. TRPH levels shall be less than 50 mg/kg, PAHs and VOCs below detection levels and metals shall be within typical background levels.

### Additional Investigation and Removal Activities

In the course of completing the RI activities, BNSF has negotiated with DTSC to perform some additional investigation/assessment activities. This additional work is described in the following sections.

#### Fill/Native Soil Contact Investigation

Each contaminated soil excavation area will be inspected by a geologist to identify and describe, to the degree possible, the contact between overlying fill materials, if present, and native soils. Observations will include soil classification, presence of staining/discoloration and foreign materials, odors and other appropriate information.

Additional investigations will also be performed around boring locations B-24, B-27, and MW-3. An excavator or backhoe will be used to excavate down to the fill/native contact depth in each of these locations. A sample will then be collected from the native soil below the contact interface. The samples will be collected as described for excavation confirmation sampling. The samples will be analyzed for BTEX and PAHs by EPA Methods 8020 and 8310, respectively. If native soils are not encountered within 10 feet bgs, the excavation will be terminated and samples will not be collected.

After the samples are collected or a depth of 10 feet is reached, the excavation will be backfilled with the excavated soil and compacted. The work will be performed under permits obtained from the City of Los Angeles, the South Coast Air Quality Management District (SCAQMD) and utility owners, as appropriate. These permits will include the following:

- Shoring Permit for the installation of shoring along Keller Street and the southwestern side of the Site.
- Excavation Permit for the excavation of soils.
- Grading Permit for the backfilling of excavations.
- Encroachment Permit for work performed adjacent to city streets.
- SCAQMD Rules 401, 402, 403 and 1166 Permits for visible emissions, nuisance dust, fugitive dust and VOC emissions from decontamination of soil, respectively.
- Utility Relocation Permits for the temporary and/or permanent relocation of existing utilities in the excavation area.

Based on the analytical results and discussions with DTSC, additional investigations and/or remediation may be performed, if necessary. If additional investigations and/or remediation are found to be necessary they will be performed in accordance with an addendum to the RAW. DTSC will comply with CEQA for any additional work under its jurisdiction.

#### Additional Investigation Around Boring B-33

The lateral and vertical extent of contamination at and around Boring B-33 will be further evaluated during implementation of the RAW. The extent of contamination will be further evaluated as the TRPH-impacted soils are removed in this location. This area is identified as "Area 1" in Figure 5.1 and is scheduled to be

excavated in the Phase I activities. Confirmation sampling will be performed as described in *Fill/Native Soil Contact Investigation* above.

The impacted soils removal depth in this area is anticipated to be 10 feet based on the Remedial Investigation (RI) data (e.g., contaminants exceeding the cleanup/removal goals are anticipated to extend to depths beyond the 10-foot maximum excavation depth limit in the RAW). To investigate the vertical limits of contamination beyond the 10-foot depth in the B-33 location, an excavator or backhoe will be utilized. The excavator/backhoe will be used to excavate a pit to a maximum safe depth of 15 to 20 feet bgs. One sample will be collected from the bottom of the pit and analyzed as described in *Fill/Native Soil Contact Investigation* above.

#### Additional Investigation Around Boring B-21

The vertical extent of contamination at Boring B-21 will be further evaluated during implementation of the RAW. The extent of contamination will be further evaluated as the TRPH and/or PAH-impacted soils are removed in this location. Boring B-21 is located within "Areas 4 and 6" as shown in Figure 5.1. The impacted soils in these areas are scheduled to be excavated in the Phase II activities. Confirmation sampling will be performed as described in *Fill/Native Soil Contact Investigation* above.

Boring B-21 is located near the property boundary in the southwest corner of the Site. As such, it will be near the planned shoring to be installed along the property boundary in this area to allow excavation of impacted soils onsite while protecting offsite property and structures. The impacted soils removal depth in this area is anticipated to be 10 feet based on the RI data (e.g., contaminants exceeding the cleanup/removal goals are anticipated to extend to depths beyond the 10-foot maximum excavation depth limit in the RAW herein). To investigate the vertical limits of contamination beyond the 10-foot depth in the B-21 location, an excavator or backhoe will be utilized. The excavator/backhoe will be used to excavate a pit to a maximum safe depth of 15 to 20 feet bgs, depending on the proximity to the shoring and the shoring design. One sample will be collected from the bottom of the pit and analyzed as described in *Fill/Native Soil Contact Investigation* above.

#### Groundwater Monitoring Well Installations

Two existing groundwater monitoring wells (i.e., MW-1 and MW-2) will be abandoned prior to initiating excavation activities in Areas 4 and 5 as shown in Figure 5.1. These wells are located within the planned excavation area boundaries and must be abandoned/closed before the impacted soils are removed. The wells will be abandoned in accordance with State of California Department of Water Resources Bulletin 74, California Water Well Standards. New monitoring wells will be installed after the excavation and backfilling activities are completed. One of the new wells, MW-4, will be located near the former location of MW-1. The other well, MW-5, will be located in an area downgradient of the impacted soils in the southwestern section of the Site as requested by DTSC. The locations of the new groundwater monitoring wells are also shown in Figure 5.1. A licensed land surveyor will survey the location and elevation of the new monitoring wells. Abandoning of existing wells and construction of new wells will be performed under appropriate well permits obtained from the County of Los Angeles Department of Health Services.

### Site Security

During removal activities, security and facilities to protect work areas from unauthorized entry, vandalism, or theft shall be maintained. Temporary chain link type fencing shall be provided along the perimeter of the Site to prevent unauthorized entry to any work areas during working and nonworking hours.

Appropriate warning signs shall be placed as required. Two construction gates shall be added along Keller Street as shown in Figures 5.1 and 5.2 in order to provide access to the work areas. Gates shall be locked at times when Site personnel are not in attendance.

### Site Access

In general, the proposed removal action incorporates the following Site access controls:

- Site will be enclosed by chain link fencing at all times.
- Access to the Site will be limited to the two gates along Keller Street. Gates shall be locked after work hours.
- Site access will be limited to only authorized personnel.
- All personnel entering the Site will be required to have the appropriate health and safety training.
- All visitors will be registered prior to entering the Site.
- Access to the excavation and stockpile areas with exposed contaminated soils will be restricted in accordance with the Health and Safety Plan (HSP).

Vehicles and equipment used in the handling of contaminated soil will be decontaminated in accordance with the HSP, before leaving the Site.

### Traffic Control

Traffic control measures will be implemented during the performance of the removal action. Traffic control for the Site shall conform to the ordinances and regulations of the jurisdictional agency having authority over traffic control and shall conform to the latest edition of the Building News Incorporated, *Work Area Traffic Control Handbook (WATCH)*, 2001. All necessary permits (i.e., a Waste Transportation Permit from the City of Los Angeles) will be obtained.

Specific traffic control patterns will be established on a day-to-day basis, responsive to work location and access needed during the construction period. Traffic flow patterns will be coordinated to ensure safe flow of traffic along Keller Street. Priority will be given to traffic entering and exiting the Piper Technical Center. These flow patterns will be established through portable traffic signs and/or flagman posted at the Site entrance and exit.

### Noise Control

A Noise Control Plan identifying noise sources and receptors, identifying monitoring methods, providing worker hearing protection requirements, and providing control methods will be implemented. Noise control measures are described in Section IV.11.

### Odor Monitoring and Control

An Odor Control Plan identifying potential odor sources and receptors, identifying monitoring methods, providing worker protection criteria, and providing control methods will be implemented. Odor monitoring and control measures are described in Section IV.3.

### Dust Control

Dust control measures will be implemented to stabilize exposed soil surfaces and minimize activities that suspend or track dust particles. Soil excavation and handling shall be accomplished in a manner that includes adequate measures to minimize and control dust and spillage of soil within the Site. Dust control measures are described in Section IV.3.

### Stormwater Management

Applicable erosion and sediment control measures shall be employed within the project area during the duration of the work in accordance with the Stormwater Pollution Prevention Plan (SWPPP). Erosion and sediment control is achieved by implementing Best Management Practices (BMPs) that are specific to this removal action. The stormwater BMPs are described in Section IV.8.

### Material Segregation

For each excavation area, soil will need to be segregated based on the type of contamination. The excavated soil will initially be segregated according to existing soil analytical data, field observation and field monitoring results. Five stockpiles will be created:

- TRPH-contaminated soils
- PAH-contaminated soils
- TRPH- and PAH-contaminated soil mixtures
- VOC-contaminated soils (SCAQMD Rule 1166)
- Non-contaminated soils
- Construction debris (e.g., concrete, asphalt, railroad ties and tracks)

### Spill Contingency

Spill prevention and control measures to prevent or reduce the discharge of pollutants to the environment from leaks or spills will be implemented during excavation, stockpiling, loading and transportation operations. These measures are described in Section IV.7.

### Health and Safety

A site-specific HSP will be prepared prior to beginning removal activities at the Site. Access to the excavation and work areas with exposed contaminated soils shall be restricted in accordance with the HSP. All field personnel involved with the excavation and removal activities shall have the requisite training and Site orientation specified.

### Documentation of Removal Activities

Documentation of removal activities will be conducted to record Site activities, sampling and monitoring results, meetings, and other pertinent events. At the conclusion of each day of soil removal activities, a written field report will be prepared summarizing the removal and sampling activities performed that day. The report shall also address the environmental controls such as BMPs, dust control, noise and odor monitoring, etc. Field reports shall be kept onsite and available for review.

Agencies Having Jurisdiction Over the project/ Types of Permits Required: The Department of Toxic Substances Control (DTSC) has jurisdiction over this project under the Cleanup Agreement, Docket No. HAS 95/96-012, dated April 8, 1996. Other agencies (i.e., the City of Los Angeles Departments of Building and Safety and Public Works, SCAQMD, County of Los Angeles Department of Health Services, and existing utility owners) will have jurisdiction over particular aspects of the project. Prior to any construction activities, the contractor shall obtain the required federal, state and local permits for the project. The contractor shall also complete the required forms/permits for construction/excavation activities (e.g., City of Los Angeles and SCAQMD). The work shall conform to applicable codes for demolition of structures, dust control, erosion and sediment control, and disposal. The permits will be available at the Site during the duration of the project.

Permit requirements will include, but not be limited to, the following:

- City of Los Angeles - Building and Safety
  - Building Permit (Shoring)
  - Excavation Permit
  - Grading Permit
- City of Los Angeles - Department of Public Works
  - Waste Transportation Route
  - Encroachment Permit
- South Coast Air Quality Management District
  - Rule 401 (Visible Emissions)
  - Rule 402 (Nuisance)
  - Rule 403 (Fugitive Dust)
  - Rule 1166 (Volatile Organic Compound Emissions from Decontamination of Soil)
- County of Los Angeles Department of Health Services
  - Groundwater monitoring well abandonment and construction
- Utility Owners

- Utility Relocation Permits

II. DISCRETIONARY APPROVAL ACTION BEING CONSIDERED BY DTSC

- |  |   |
|--|---|
| <input type="checkbox"/> Initial Permit Issuance | <input type="checkbox"/> Removal Action Plan                |
| <input type="checkbox"/> Permit Renewal          | <input checked="" type="checkbox"/> Removal Action Workplan |
| <input type="checkbox"/> Permit Modification     | <input type="checkbox"/> Interim Removal                    |
| <input type="checkbox"/> Closure Plan            | <input type="checkbox"/> Other (Specify)                    |
| <input type="checkbox"/> Regulations             |   |
- 

Program/ Region Approving Project: Cal/EPA Department of Toxic Substances Control; Southern California Cleanup Operations Branch, 1011 North Grandview Avenue, Glendale, California 91201

Contact Person/ Address/ Phone Number: Mr. Stephen Cutts; Cal/EPA Department of Toxic Substances Control; Southern California Cleanup Operations Branch, 1011 North Grandview Avenue, Glendale, California 91201, (818) 551-2178

III. ENVIRONMENTAL RESOURCES POTENTIALLY AFFECTED

The boxes checked below identify environmental resources which were found in the following ENVIRONMENTAL SETTING/IMPACT ANALYSIS section to be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact".

- |  |  |  |
|--|--|--|
| <input type="checkbox"/> Aesthetics                      | <input type="checkbox"/> Hazards and Hazardous Materials | <input type="checkbox"/> Population and Housing        |
| <input type="checkbox"/> Agricultural Resources          | <input type="checkbox"/> Hydrology and Water Quality     | <input type="checkbox"/> Public Services               |
| <input type="checkbox"/> Air Quality                     | <input type="checkbox"/> Land Use and Planning           | <input type="checkbox"/> Recreation                    |
| <input type="checkbox"/> Biological Resources            | <input type="checkbox"/> Mineral Resources               | <input type="checkbox"/> Transportation and Traffic    |
| <input type="checkbox"/> Cultural Resources              | <input type="checkbox"/> Noise                           | <input type="checkbox"/> Utilities and Service Systems |
| <input type="checkbox"/> Geology And Soils               |  | <input type="checkbox"/> Cumulative Effects            |
| <input type="checkbox"/> Hazards and Hazardous Materials |  |  |

#### IV. ENVIRONMENTAL IMPACT ANALYSIS

The following pages provide a brief description of the physical environmental resources that exist within the area affected by the proposed project and an analysis of whether or not those resources will be potentially impacted by the proposed project. Preparation of this section follows guidance provided in DTSC's California Environmental Quality Act Initial Study Workbook [Workbook]. A list of references used to support the following discussion and analysis are contained in Attachment A and are referenced within each section.

Mitigation measures which are made a part of the project (e.g: permit condition) or which are required under a separate Mitigation Measure Monitoring or Reporting Plan which either avoid or reduce impacts to a level of insignificance are identified in the analysis within each section.

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#### **1. Aesthetics**

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*Project activities likely to create an impact:* **Excavation and removal of contaminated soils in the upper 10 feet of portions of the Site.**

*Description of Environmental Setting:* **The Site is located in an area zoned as “M3-1” (heavy industrial). The southern portion of the Site, which is paved and fenced, is leased to the Los Angeles Police Department (LAPD). The LAPD uses this area for a police car salvage lot and parts storage area. The remaining portion of the Site, which is also paved and fenced, is currently vacant. In the past few years it has been used by the California Department of Transportation (Caltrans) as a materials laydown area for bridge retrofit work on the adjacent Santa Ana Freeway and Rapid Transit District (RTD) busway overpass and Cesar E. Chavez Avenue overpass.**

**The north side of the Site is bordered by the Cesar E. Chavez Avenue overpass. The south side of the Site is bordered by the Santa Ana Freeway and RTD busway overpass. The east side of the Site is bordered by the Los Angeles River. The riverbed has been channelized and paved with concrete in this area to improve its primary function as a flood control channel. The west side of the Site is bordered by Keller Street. The City of Los Angeles Piper Technical Center is located on the opposite side of Keller Street. This is a multi-story brick and concrete building used to support various city maintenance activities. The LAPD uses the roof of the building for helicopter operations. There are no windows in the side of the building facing the Site. Keller Street is not a through street, dead-ending at the north end of the Site. Hence, traffic on Keller Street is limited to employee and vendor vehicles associated with Piper Technical Center.**

*Analysis of Potential Impacts:*

Describe to what extent project activities would:

- a. Have a substantial adverse effect on a scenic vista.

**Vistas of the Site are very limited. It can only be seen by traffic on limited stretches of Cesar E. Chavez Avenue, the RTD busway overpass and Keller Street.**

- b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and historic buildings within a state scenic highway.

**Activities associated with the project are similar to construction material laydown activities that the Site has been used for in the recent past. The Site is currently paved and fenced. Other than the LAPD car salvage lot, the Site is vacant. There are no rock outcroppings, historic buildings or other scenic resources on the Site. There are a few trees located along the east side of Keller Street and these will be preserved during the proposed removal action.**

- c. Substantially degrade the existing visual character or quality of the Site and its surroundings.

**Upon completion of the proposed removal action, the visual character of the Site will be returned to essentially that which currently exists.**

- d. Create a new source of substantial light of glare that would adversely affect day or nighttime views in the area.

**The proposed work is expected to be performed during daylight hours without the use of artificial lighting.**

References: 8.

Findings of Significance:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

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## 2. Agricultural Resources

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*Project activities likely to create an impact.* **No project activities will create an agricultural resource impact. The Site is currently zoned as "M3-1" (heavy industrial) and the zoning will not change as a result of the project.**

*Description of Environmental Setting:* **The Site is located in an area zoned as “M3-1” (heavy industrial). The southern portion of the Site, which is paved and fenced, is leased to the LAPD. The LAPD uses this area for a police car salvage lot and parts storage area. The remaining portion of the Site, which is also paved and fenced, is currently vacant. In the past few years it has been used by Caltrans as a materials laydown area for bridge retrofit work on the adjacent Santa Ana Freeway and RTD busway overpass and Cesar E. Chavez Avenue overpass.**

*Analysis of Potential Impacts:*

Describe to what extent project activities would:

- a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.

**The Site has not been used for agricultural purposes for over 100 years; hence, the proposed removal action will not result in the conversion of any farmland to non-agricultural purposes.**

- b. Conflict with existing zoning or agriculture use, or Williamson Act contract.

**The Site is currently zoned as “M3-1” (heavy industrial) and the zoning will not change as a result of the project.**

- d. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural uses.

**Project activities will not involve any changes in the existing environment that could result in the conversion of Farmland to non-agricultural uses.**

*References:* 5 and 8.

*Findings of Significance:*

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

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### 3. Air Quality

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*Project activities likely to create an impact:* **Excavation of contaminated soils and vehicle emissions during excavation and transportation activities.**

*Description of Environmental Setting:* **The Site is located in the South Coast Air Quality Management District (SCAQMD) in the Los Angeles Basin, an area of relatively mild, semi-arid climate. The annual average temperature is about 63 degrees Fahrenheit (<sup>0</sup>F) with a mean daily maximum temperature of 98<sup>0</sup>F and a mean daily minimum temperature of 39<sup>0</sup>F. Prevailing winds are relatively light to moderate breezes from both the easterly and westerly directions.**

**Current air quality and ambient standards are shown in Table 2. The South Coast Air Basin (SCAB) is nonattainment of state and federal ozone and PM<sub>10</sub> standards.**

*Analysis of Potential Impacts:*

Describe to what extent project activities would:

- a. Conflict with or obstruct implementation of the applicable air quality plan.

**The proposed project will comply with all rules and regulations of the SCAQMD. These rules and regulations implement the SCAB Clean Air Plan and the SCAB portion of the State Implementation Plan (SIP), and hence, will bring the SCAB into compliance with ambient air quality standards. The air emissions from the proposed project are less than the thresholds allowed by the SCAQMD, as shown in Table 3. Hence, the proposed project will not conflict with or obstruct implementation of the applicable air quality plan.**

- b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation.

**An inventory of air emissions expected during the proposed project was prepared (see Table 3). This emission inventory is based on the *Proposed Removal Activities*, and the requisite types of construction equipment. The following construction equipment is anticipated to be used during the remedial activities:**

- **An excavator (e.g., CAT 235, John Deere 792, etc.) will be used for an estimated 22 work days to build the decontamination pads, remove existing asphalt pavement and rail tracks, excavate contaminated soil, and excavate test pits for additional investigation activities.**
- **A front end loader (e.g., CAT 966) will be used for an estimated 41 work days to build the decontamination pads, remove existing asphalt pavement and rail tracks, and excavate and load contaminated soil.**

- A water truck (e.g., a single rear axle 2000 gallon capacity tank truck) will be used for an estimated 26 work days to build the decontamination pads, remove existing asphalt pavement and rail tracks, and excavate and load contaminated soil.
- A compactor (e.g., CAT 815) will be used for an estimated 5 work days to compact the clean backfill soil.
- A crane (e.g., 14 ton capacity) will be used for an estimated 5 work days to install excavation shoring.
- Tractor/trailer haul trucks will be used for an estimated 41 work days to haul contaminated soil to the recycling facility. The number of trucks to be used will likely range from 6 to 8. While other equipment is operating at the Site, loading and transporting contaminated soil will be limited to 12 truck trips per day. For days when no other equipment is operating at the Site a maximum of 16 trucks will be loaded with contaminated soil for transport to the recycling facility. On trips to the Former Macy Street Site the haul trucks will be loaded with the clean import soil to be used for backfilling the excavations. Hence, air emissions related to importing clean fill material have been accounted for in the calculations summarized in Table 3.

Load and emission factors used for calculating the emissions were taken from the SCAQMD CEQA Air Quality Handbook and equipment manufacturer's published data. The calculated total project PM<sub>10</sub> emissions were compared to applicable SCAQMD threshold levels (see Table 3). For each category of emissions, the calculated total project emissions are well below the SCAQMD threshold levels.

Air quality permit requirements will be followed and will include, but not be limited to, the following:

- SCAQMD Rule 401 (Visible Emissions)
- SCAQMD Rule 402 (Nuisance)
- SCAQMD Rule 403 (Fugitive Dust)
- SCAQMD Rule 1166 (Volatile Organic Compound Emissions from Decontamination of Soil)

- c. Result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors).

The SCAQMD threshold emission limits shown in Table 3 were established so that a project emitting less would not cause a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment (i.e., ozone, PM<sub>10</sub> and precursors). Because SCAQMD is a non-attainment area for particulate matter and ozone, the following control measures will be implemented to reduce the air quality impacts during the remediation of the Site.

1. **A Miniature Real-time Aerosol Monitor (MiniRAM) will be placed on the prevailing downwind side of the Site to monitor for airborne particulate emissions during excavation and soil handling activities. The MiniRAM will provide instantaneous and time-weighted average (TWA) concentrations of particulate matter in the size of 10 microns or less (PM<sub>10</sub>). Best Available Control Measures will be implemented in accordance with SCAQMD Rule 403 to limit dust emissions to less than the SCAQMD threshold of 150 pounds per day of PM<sub>10</sub>. If downwind PM<sub>10</sub> criteria are exceeded, watering frequency will be increased.**
2. **A water truck will be used for dust control during soil excavation, handling and replacement activities.**
3. **Stockpiles of excavated soil will be placed on and covered by plastic sheeting held in place with tied sandbags for dust control.**
4. **Dust control measures will be specified based on the results of dust monitoring, onsite activities, type and location of operations, and the prevailing wind direction. Dust control measures shall include, but not be limited to, the following:**
  - **Provide wet suppression of exposed soils during excavation, loading, and unloading of contaminated soils.**
  - **Haul trucks transporting contaminated soil shall be adequately tarped before leaving the Site.**
  - **Reduce speed on unpaved areas, and limit onsite traffic speed.**
  - **Cover and secure stockpiles and exposed areas at the end of each workday.**
5. **In addition, the number of daily truck trips for hauling contaminated soil to the recycling facility and importing clean fill material will be limited so that threshold levels will not be exceeded (see Table 3).**

d. Expose sensitive receptors to substantial pollutant concentrations.

**The nearest sensitive receptors are at the following locations:**

- **Utah Elementary School, 255 North Clarence Street, Los Angeles, California, approximately 1/3-mile southeast of the Site.**
- **White Memorial Hospital, 1720 Cesar E. Chavez Avenue, Los Angeles, California, approximately 2/3-mile southeast of the Site.**
- **A day care center at One Gateway Center, Los Angeles, California, approximately 1/5-mile west of the Site.**
- **The closest nursing home is White Memorial Medical Center, 1720 Cesar E. Chavez Avenue, Los Angeles, California, approximately 2/3-mile southeast of the Site.**

As discussed under Section 3.a. above, the fact that air emissions from the proposed project will be less than the SCAQMD thresholds for construction means that the resulting concentrations will not be substantial at nearby receptors, including those that are sensitive (i.e., young, elderly, ill, etc.). Hence, implementation of the proposed removal action will not expose sensitive receptors to substantial pollutant concentrations.

- e. Create objectionable odors affecting a substantial number of people.

An Odor Control Plan identifying potential odor sources and receptors, identifying monitoring methods, providing worker protection criteria, and providing control methods will be implemented. The primary odor source at the Site will be the PAH- and TRPH-contaminated soil that will be exposed and excavated. The principal contaminants anticipated to be excavated at the Site would have distinctive odors of petroleum oil. Use of construction equipment may also be considered as an odor source.

Potential odor receptors include onsite workers, police and non-police personnel, pedestrians, and vehicle drivers adjacent to the Site. Due to public perception issues, it will be very important to monitor and control odors at the Site.

Monitoring will occur within the Exclusion Zone and at the perimeters of the Exclusion Zone, Decontamination Zone, Support Zone and the Site. The monitoring frequency will be determined according to the type and location of operations. However, monitoring for VOCs will commence at the beginning of excavation or grading and will occur at least once every hour. Concentrations will be recorded. Monitoring of VOCs be conducted using an Organic Vapor Analyzer (OVA) properly calibrated with hexane.

If the VOC concentration in the soil exceeds 1,000 ppm, the soil will be sprayed with water or vapor suppressant and as soon as possible, but not more than 15 minutes, be placed in sealed containers or loaded into trucks, moistened with additional water, covered and transported offsite.

If volatile emissions are suspected based on OVA results or excavation of significant odor sources, air samples will be collected in Summa canisters. A state-certified laboratory will analyze samples for VOCs and SVOCs by EPA Methods TO-15 and -13, respectively.

Air monitoring results will be immediately documented and kept onsite. Documentation will include equipment calibration data, background concentrations, monitoring results, monitoring locations, source description, air temperature, and wind direction.

Odors will generally be perceived at concentrations well below health risk thresholds. Worker protection will be conducted according to the HSP. Worker protection may include respirators, rotating crews in work area, and/or controlling odors as discussed below.

Detection of strong odors within the work area or discernible odors or OVA readings above background at the perimeter of the work area will be used as triggers for odor control measures as required by SCAQMD Rule 402. Odor control materials and equipment will be onsite and available at all times. The control measures shown below (listed in general order of preferential use) may be used at the Site.

- Application of water.
- Application of water with environmentally safe additives (e.g., Simple Green or equivalent).
- Application of environmentally safe chemical suppressants (e.g., Bio-Solve or equivalent).
- Application of chemical foams.
- Coverage of area with 10-mil thick plastic sheeting.
- Coverage of area with clean soil and reevaluation of situation.

The distance between the Site and a “substantial number of people” is sufficiently great (the nearest residential area is approximately 1/2-mile to the southeast) to dissipate the diesel exhaust of the construction equipment and enough to prevent objectionable odor.

In addition, the following are addressed to meet the requirements set forth under Section 711.4, Fish and Game Code and 753.5, Title 14, Code of California Regulations relating to filing of environmental fees:

- Degradation of any air resources that will individually or cumulatively result in a loss of biological diversity among the plants and animals residing in that area.

The severely limited biological diversity among the plants and animals residing in the area of the proposed project will not be reduced by the short-term (i.e., approximately 2-1/2 months) emissions from construction equipment that are less than the allowable SCAQMD thresholds (SCAQMD, 1993).

*References:* 4, 7, and 8.

*Findings of Significance:*

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

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#### **4. Biological Resources**

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*Project activities likely to create an impact:* **No project activities are expected to create a biological impact.**

*Description of Environmental Setting:* **The Site is located in an area zoned as “M3-1” (heavy industrial) and has been developed for various industrial uses for over 100 years. The southern portion of the Site, which is paved and fenced, is leased to the LAPD. The LAPD uses this area for a police car salvage lot and parts storage area. The remaining portion of the Site, which is also paved and fenced, is currently vacant. In the past few years it has been used by Caltrans as a materials laydown area for bridge retrofit work on the adjacent Santa Ana Freeway and RTD busway overpass and Cesar E. Chavez Avenue overpass. The surrounding area within one mile of the Site is zoned for, and has been developed for over 100 years for, a combination of residential, commercial and industrial uses. Although the Los Angeles River borders the east side of the Site, it has been channelized and paved with concrete for many years.**

*Analysis of Potential Impacts:*

Describe to what extent project activities would:

- a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

**The site of the proposed removal action is completely paved. Therefore the proposed remedial action will not disturb areas occupied by plants or animals. As such, there will be no changes to the diversity of plant and animal species; no reductions in the numbers of any candidate, sensitive, or special status species of plants and animals; and no introduction of any new species of plants and animals.**

- b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

**The site of the proposed removal action is completely paved. Therefore, the proposed removal action will not disturb areas of riparian habitat or other sensitive natural community. As such, the proposed removal action will have no adverse effect on any riparian habitat or other sensitive natural community.**

- c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

**The Site is not a wetland. A Storm Water Pollution Prevention Plan (SWPPP) will be implemented during the Removal Action to provide erosion control and prevent sediment from leaving the Site.**

- d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

**The site of the proposed removal action is completely paved. Therefore, the proposed removal action will not interfere with the movement of any native resident or migratory fish or wildlife species, nor with established native resident or migratory wildlife corridors. The proposed removal action will not impede the use of native wildlife nursery sites.**

- e. Conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

**The site of the proposed removal action is completely paved and no biological resources exist at the site. Therefore, the proposed removal action will not conflict with local policies or ordinances protecting biological resources.**

- f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

**The site of the proposed removal action is completely paved. As such, no habitat or natural community exists at the Site. Therefore, the proposed removal action will not conflict with provisions of any local, regional, or state habitat conservation plan.**

In addition, the following are addressed to meet the requirements set forth under Section 711.4, Fish and Game Code and 753.5, Title 14, Code of California Regulations relating to filing of environmental fees:

Plants:

- Changes to any riparian land or wetlands under state or federal jurisdiction.

**The proposed removal action will not result in any changes to riparian land or wetlands under state or federal jurisdiction.**

- Changes to soil required to sustain habitat for fish and wildlife.

**The proposed removal action will not result in any changes to soil required to sustain habitat for fish and wildlife.**

- Any adverse effect to native and non-native plant life.

**The proposed removal action will not disturb vegetated areas.**

- Effects to rare and unique plant life and ecological communities dependent on plant life.

**The proposed removal action will not have any adverse effect on rare and unique plant life and ecological communities dependent on plant life.**

- Any adverse effect to listed threatened and endangered plants.

**The proposed removal action will not have any adverse effect to listed threatened and endangered plants.**

- Effects on habitat in which listed threatened and endangered plants are believed to reside.

**The proposed removal action will not change the environmental setting of the Site or the surrounding area. Therefore, it will not have any effects on habitat in which listed threatened and endangered plants are believed to reside.**

- Effects on species of plants listed as protected or identified for special management in the Fish and Game Code, the Public Resources Code, the Water Code, or regulations adopted thereunder.

**The proposed removal action will not have any effects on species of plants listed as protected or identified for special management in the Fish and Game Code, the Public Resources Code, the Water Code, or regulations adopted thereunder.**

- Effects on marine and terrestrial plant species subject to the jurisdiction of the Department of Fish and Game and ecological communities in which they reside.

**The proposed removal action will have no effects on marine and terrestrial plant species subject to the jurisdiction of the Department of Fish and Game and ecological communities in which they reside.**

#### Animals:

- Effects on listed threatened or endangered animals.

**The proposed removal action will have no effects on listed threatened or endangered animals.**

- Effects on habitat in which listed threatened or endangered animals are believed to reside.

**The proposed removal action will not change the environmental setting of the Site or the surrounding area. Therefore, it will have no effects on habitat in which listed threatened or endangered animals are believed to reside.**

- Effects on species of animals listed as protected or identified for special management in the Fish and Game Code, the Public Resources Code, the Water Code, or regulations adopted thereunder.

**The proposed removal action will have no effects on species of animals listed as protected or identified for special management in the Fish and Game Code, the Public Resources Code, the Water Code, or regulations adopted thereunder.**

- Effects on marine and terrestrial animal species subject to the jurisdiction of the Department of Fish and Game and the ecological communities in which they reside.

**The proposed removal action will have no effects on marine and terrestrial animal species subject to the jurisdiction of the Department of Fish and Game and ecological communities in which they reside.**

*References:* 5, 7 and 8.

*Findings of Significance:*

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

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## **5. Cultural Resources**

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*Project activities likely to create an impact:* **No project activities are expected to create an impact on cultural resources.**

*Description of Environmental Setting:* No previously recorded historic or prehistoric cultural resources are located within the project boundaries (TRC, October 2002). Although numerous historic structures and resources are located in proximity to the Site, none will be affected by the proposed remediation activities. The results of the background literature review and archival investigation have determined that no significant surface or subsurface cultural remains are present beneath the asphalt pavement on the project parcel.

*Analysis of Potential Impacts:*

Describe to what extent project activities would:

- a. Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5.

**Known uses of the Site have been limited to industrial purposes, so the proposed removal action will not cause any adverse change in the significance of a historical resource as defined in 15064.5.**

- b. Cause a substantial adverse change in the significance of an archeological resource pursuant to 15064.5.

**This Site does not have archeological significance. The proposed removal action will not destroy an archeological resource.**

- c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

**The proposed removal action will not destroy a paleontological resource or site, or a unique geologic feature.**

- d. Disturb any human remains, including those interred outside of formal cemeteries.

**There is no record of the Site housing human remains or past cemeteries.**

*References:* 5, 7 and 8b.

*Findings of Significance:*

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

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**6. Geology and Soils**

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*Project activities likely to create an impact:* **Excavation of contaminated soils.**

*Description of Environmental Setting:* **The Site is located in the Peninsular Range Province at the northeast margin of the Los Angeles Coastal Plain subprovince. Regional geologic maps indicate that Recent age fluvial sediments, consisting of fine- to coarse-grained sand and pebble to boulder gravels with occasional lenses of clay, underlie the Site. The Recent sediments in the near vicinity of the Site range in thickness from 50 to 100 feet and are underlain by Miocene age, marine sediments of the Puente Formation.**

**Site-specific subsurface investigations have encountered fill soils from the ground surface to depths ranging from 3 to over 10 feet. The fill soils consist of sand, gravel, silt and clay, and contain minor amounts of brick, wood and asphalt fragments. The fill soils are underlain by fluvial deposits. The fluvial materials, in general, are separated into an upper unit of sand and a lower unit of sand and gravel. The upper sand is fine- to coarse-grained with some silt layers, a trace of pebble gravel, and a thickness ranging between 5 to 22 feet. The lower unit of sand and gravel contains fine- to coarse-grained sands and pebble to cobble gravel.**

**Grading permit requirements will be followed and will include, but not be limited to, the following:**

- **City of Los Angeles - Building and Safety**
  - **Building Permit (Shoring)**
  - **Excavation Permit**
  - **Grading Permit**
- **City of Los Angeles - Department of Public Works**
  - **Encroachment Permit**

*Analysis of Potential Impacts:*

Describe to what extent project activities would:

- a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

- Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. (Refer to Division of Mines and Geology Special Publication 42)

**The Site is not located in an Alquist-Priolo Earthquake Fault Zone (California Division of Mines and Geology, 1997).**

- Strong seismic ground shaking

**The proposed removal action will do nothing to expose people or structures to the effects of strong seismic ground shaking.**

- Seismic-related ground failure, including liquefaction

**Although the Site is located within an area identified as being susceptible to liquefaction during a strong earthquake, the proposed Removal Action will not change this condition.**

- Landslides

**The proposed removal action will do nothing to expose people or structures to the effects of landslides.**

- b. Result in substantial soil erosion or the loss of topsoil.

**Best Management Practices (BMPs) will be employed while the excavation is open to limit erosion of soil. The relatively flat grade at the Site will naturally limit erosion of the backfilled area. Temporary erosion and sediment control measures during construction will include, but not be limited to, the following BMPs:**

- **Runoff diversion and sediment trapping and filtering. Runoff diversion will be provided during periods of forecast precipitation. Sediment trapping and filtering will be accomplished by the use of temporary silt fences, sediment traps, straw bale or sandbag barriers, or storm drain inlet protection.**
- **Appropriate structural and non-structural BMPs will be implemented to minimize the introduction of pollutants into the drainage system.**
- **Construct temporary stockpile liner and silt fences within the Site.**
- **Cleaning of roadway surfaces as directed by the City of Los Angeles.**

**At the end of each workday, stockpiles will be covered and secured. The temporary stockpiles will be covered with plastic sheeting and secured with a sandbag anchoring system to prevent storm water runoff from contacting the stockpiled soil, and wind erosion. Additionally, the stockpile location will be equipped with a perimeter silt fence at the downgradient location as an additional erosion protection. At the end of each workday, the stockpile cover and anchoring system, the condition of the silt fences, and any additional erosion control measures will be inspected and deficiencies will be corrected. Vehicles or other equipment will not be allowed to travel or stage near the stockpiles.**

- c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction or collapse.

**The proposed removal action will not impact soil stability. During the removal action, the excavation sides will either be shored or sloped in accordance with permits issued by the City of Los Angeles to ensure their stability. The proposed Removal Action includes excavating soils from the upper 10 feet of the Site, which contain concentrations of PAHs and TRPH above the cleanup goals. After cleanup confirmation samples are taken, the excavation will be backfilled with clean soil and the Site restored to approximately the same grades that existed prior to the start of the Removal Action.**

- d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

**The Site is not located on expansive soil.**

- e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of water.

**No septic tanks or alternative non-sewer systems would be associated with this project.**

*References:* 2, 5, 6, 7 and 8.

*Findings of Significance:*

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

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## **7. Hazards and Hazardous Materials**

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*Project activities likely to create an impact:* **Excavation and transportation of contaminated soils.**

*Description of Environmental Setting:* **Upset conditions and hazards include natural disasters and associated unforeseen emergencies such as fire, equipment failure and vandalism. External**

upset conditions such as natural disasters should have a similar environmental effect regardless of whether they occur during project implementation. Lesser upset conditions such as small fires may be contained by project personnel using required onsite fire extinguishing equipment. Spill control equipment will be present in case of an equipment malfunction or failure, such as a leaking or burst hose or pipe. Such equipment could be used by Site personnel to prevent the release of hazardous substances from applicable upset conditions such as flooding or earthquake. Secondary containment will be used for the temporary storage of fluids generated during the decontamination operations. This measure should prevent the release of contaminants in the unlikely event that the primary containment fails. Storm drain inlets and other pathways to the river will be covered to prevent a leak or spill from causing hazardous substances to enter the river during the project. During the project, barricades will be erected to deter unauthorized personnel from entering the Site.

*Analysis of Potential Impacts:*

Describe to what extent project activities would:

- a. Create a significant hazard to the public or the environment throughout the routine transport, use or disposal of hazardous materials.

**Contaminated soils from an excavation will be treated or removed within 30 days from the time of excavation. If the VOC concentration in the excavated soil is measured at greater than 1,000 ppm, the soils will be sprayed with water or vapor suppressant and as soon as possible, but not more than 15 minutes later, the soil will be placed into sealed containers or trucks, moistened with additional water, covered and transported offsite. Other alternative storage methods approved in writing by the SCAQMD Executive Officer may be implemented.**

**The waste streams will be taken to preapproved treatment and disposal facilities. The contaminated soil will be trucked offsite to an authorized treatment facility following procedures outlined in the Waste Transportation and Disposal Plan (TRC, 2002). The waste will be manifested and the truck will be labeled in accordance with Department of Transportation regulations. A licensed and State-certified waste transportation contractor will be hired to remove and properly dispose of the waste removed from the Site.**

**Contaminated soils will be analyzed after treatment pursuant to the facility's operating permit requirements. Documentation of treatment confirmation will be provided by the facility and included in the RAW final documentation report.**

**After each of the six areas has been excavated to the appropriate depth, samples will be collected and analyzed from the sidewalls and excavation bottoms. A 30-foot by 30-foot sampling grid will be used on the bottom of excavations.**

The bottoms and sidewalls of excavations will be examined for evidence of contamination prior to selecting sample locations. If evidence of contamination is indicated, the confirmation samples or additional samples will be collected from those suspect locations. Confirmation sidewall samples will be selected based on the zone depths of former contamination, or additional samples will be collected in these former contaminant zones.

Approximately 26 samples will be collected and analyzed from the contaminated excavated soil and another, approximately 26 samples will be collected and analyzed from the imported fill to verify that they meet the requirements of impacted and nonimpacted soils, respectively.

Approximately 10 samples will be analyzed from the new groundwater monitoring wells to ascertain the soil impacts in the locations selected.

After the soil has been treated at the treatment facility, samples will be tested pursuant to the facility's operating permit to assure that the treatment has been successful. The soil will then be certified clean and can be used as backfill.

Samples collected from the excavations, the imported backfill, and during the monitoring well installation will be analyzed for the following:

- TPH (EPA Method 8015M)
- BTEX (EPA Method 8020)
- PAHs (EPA Method 8310)
- Metals of concern (EPA Methods 6010/7000)

Spill prevention and control measures to prevent or reduce the discharge of pollutants to the environment from leaks or spills will be implemented during excavation, stockpiling, loading and transportation operations. At a minimum, measures to prevent spillage of contaminated soil while loading and hauling will include the following:

- Placing plastic sheeting around the haul trucks as they are being loaded to control the tracking of any spilled soil.
- Covering the trucks with tarps or plastic sheeting before proceeding to the offsite treatment facility.
- When hauling over public highways, loads shall be trimmed and material removed from shelf areas of vehicles to eliminate spilling materials.

Contaminated soils that are spilled outside of containment/control/stockpile areas onsite will be immediately recovered and placed into an appropriate storage location/container. If the spill occurs on soil, some additional surface soil will be recovered/removed along with the contaminated soils. If the spill occurs on asphalt, residual spilled soils will be scraped up. The waste streams will be taken to preapproved treatment and disposal facilities. The contaminated soil will be trucked to an authorized treatment

facility following procedures outlined in the Waste Transportation and Disposal Plan (TRC, 2002). The waste will be manifested and the truck will be labeled in accordance with Department of Transportation regulations. A licensed and State-certified waste transportation contractor will be hired to remove and properly dispose of the waste.

- b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

The remediation activities include hazards that may be caused by human error or machinery failure. Should an accidental spill occur on the highway, all Department of Transportation regulations for spills will be complied with. Potential receptors include anyone who comes in direct contact with the waste by way of direct skin contact or by ingesting the waste. If a spill occurs, the driver of the truck will notify the local authorities for implementation of cleanup activities. Since the trucks will be appropriately labeled, any waste spill clean-up workers will be able to adequately don the appropriate protective gear to deal with this waste.

In the event of an emergency or spill during transport to the treatment facility, the driver of the hauling truck will use the following procedures:

- Park the vehicle in the most secure area available, away from homes, traffic, waterways, and businesses.
- Stay with the vehicle until appropriate support has arrived; move a safe distance away from the vehicle or spill material if danger exists.
- Notify the appropriate emergency contacts.

Contaminated soils that are spilled offsite will be properly removed/cleaned up pursuant to directions of local authorities (e.g., California Highway Patrol, City, County, etc.).

There is always a risk of earthquake activity in California. Project activities will not expose people or structures to any substantial adverse effect, or create an upset to the closest fault. Should an earthquake occur during project activities, work will be stopped and machinery secured. The Site will be inspected for signs of subsidence, structural failure or other earthquake created hazards.

- c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school.

The closest sensitive populations are the employees and students at the MTA daycare center located approximately 1000 feet west of the Site. This facility is separated from the Site by the Piper Technical Center, which is a multi-story office/maintenance building. The closest school (Utah Street School) is located approximately 2000 feet southeast of the Site. The closest hospital (White Memorial Hospital) is located approximately 3500 feet

**southeast of the Site. It is not anticipated that any of these populations would be affected by any hazards that might emanate from the remediation activities. No acutely hazardous materials will be handled at the Site.**

- d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.

**The current list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 was reviewed and the site of the proposed removal action was not included on the list. The proposed removal action will not create a significant hazard to the public or the environment.**

- e. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

**A Site Health and Safety Plan will be prepared prior to the start of work. The Health and Safety Plan will delineate the location of the nearest hospital where personnel are to be taken for treatment. Project activities will not interfere with or impair the implementation of any emergency response or evacuation plan.**

*References: 7 and 8.*

*Findings of Significance:*

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

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## **8. Hydrology and Water Quality**

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*Project activities likely to create an impact. Excavation and transportation of contaminated soils. Installation of groundwater monitoring wells.*

*Description of Environmental Setting:*

The Site is located adjacent to the west bank of the Los Angeles River. The river has been channelized through this area with both banks and the riverbed being covered with concrete pavement.

The Site is located in the Los Angeles Forebay of the Central Basin subunit of the South Coastal Basin. Regional groundwater in the area generally flows to the southwest. Groundwater was encountered beneath the Site between 31 and 33.5 feet below ground surface during installation of borings and monitoring wells (MWs). The groundwater beneath the Site does not appear to be perched (confined). Based on an elevation survey in May 1997 of the three monitoring wells (MW-1, MW-2 and MW-3), the groundwater gradient was calculated at 0.0083 foot per foot with flow to the south/southeast, towards the Los Angeles River. Similar gradients and flow directions have been calculated from September 1997, March 2000 and November 2001 data.

VOCs, PAHs, and metals have been detected in the groundwater. A thin layer of free product has been found in one of the wells (i.e., MW-1) during previous sampling events. Shallow groundwater sampled at the three onsite monitoring wells is for the most part contaminated by sources likely situated upgradient from the Site and unrelated to historic or current land uses at the Site, with the exception of the former adjacent manufactured gas plant and butadiene facilities. See *Nature and Extent of Contamination* section in *Project Information* for a more detailed discussion.

This shallow groundwater is not currently used for drinking. It is very unlikely that the shallow groundwater will be used as a drinking water supply in the future.

*Analysis of Potential Impacts:*

Describe to what extent project activities would:

- a. Violate any water quality standards or waste discharge requirements.

Since the area of the Site is less than 5 acres, no Notice of Intent (NOI) is required under California NPDES regulations for the remediation activities. However, BMPs outlined in the California NPDES regulations will still be employed at the Site. Should equipment failure occur (e.g., a hose rupture), any release of hazardous materials will be contained and cleaned up. Spill control equipment will be present in case of an equipment malfunction or failure. Such equipment could be used by Site personnel to prevent the release of hazardous substances from other upset conditions such as unexpected flooding or earthquakes.

Temporary erosion and sediment control measures during construction will include, but not be limited to, the following BMPs:

- Runoff diversion and sediment trapping and filtering. Runoff diversion will be provided during periods of forecast precipitation. Sediment trapping and filtering will be accomplished by the use of

temporary silt fences, sediment traps, straw bale or sandbag barriers, or storm drain inlet protection.

- **Appropriate structural and non-structural BMPs will be implemented to minimize the introduction of pollutants into the drainage system.**
- **Construct temporary stockpile liner and silt fences within the Site.**
- **Cleaning of roadway surfaces as directed by the City of Los Angeles.**

**At the end of each workday, stockpiles will be covered and secured. The temporary stockpiles will be covered with plastic sheeting and secured with a sandbag anchoring system to prevent storm water runoff from contacting the stockpiled soil, and wind erosion. Additionally, the stockpile location will be equipped with a perimeter silt fence at the downgradient location as an additional erosion protection. At the end of each workday, the stockpile cover and anchoring system, the condition of the silt fences, and any additional erosion control measures will be inspected and deficiencies will be corrected. Vehicles or other equipment will not be allowed to travel or stage near the stockpiles.**

- b. **Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficient in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).**

**Groundwater contamination is addressed separately. This separation was undertaken in order to expedite the cleanup of the contaminated soil and allow re-use of the property while continuing characterization of the groundwater. No groundwater is anticipated to be contacted. Two existing groundwater monitoring wells (i.e., MW-1 and MW-2) will be abandoned prior to initiating excavation activities in Areas 4 and 5 as shown in Figure 5.1. These wells are located within the planned excavation area boundaries and must be abandoned/closed before the impacted soils are removed. New monitoring wells will be installed after the excavation and backfilling activities are completed. One of the new wells, MW-4, will be located near the former location of MW-1. The other well, MW-5, will be located in an area downgradient of the impacted soils in the southwestern section of the Site as requested by DTSC. The locations of the new groundwater monitoring wells are also shown in Figure 5.1. A licensed land surveyor will survey the location and elevation of the new monitoring wells. The existing wells to be abandoned and the construction of new wells will be performed under appropriate well permits obtained from the County of Los Angeles Department of Health Services. Project activities will not deplete or affect any groundwater supplies. The project activities will be in compliance with all state and federal water quality standards and waste discharge requirements.**

- c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or offsite.

**After removal of the contaminated soil, clean fill material will be brought in to fill the resulting depression and the Site will be graded, pursuant to a permit issued by the City, to restore the current drainage by surface runoff to storm drains located in Keller Street. Project activities will not create a substantial permanent change to the existing drainage pattern of the Site. The project will not contribute to erosion or siltation on or off-site.**

- d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off-site.

**See response to Subsection C, above.**

- e. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.

**The project will not create or contribute to existing runoff water that would exceed the capacity of the existing storm drainage system. See response to Subsection A above.**

- f. Otherwise substantially degrade water quality.

**The project will not otherwise degrade water quality. Waste water (i.e., equipment decontamination fluids and new groundwater well development and purge water) will be contained onsite in suitable containers (e.g., 55-gallon DOT-rated steel drums, Baker tanks). The waste water will be disposed of offsite at an appropriately licensed treatment and disposal facility.**

- g. Place within a 100-year flood hazard area structures that would impede or redirect flood flows.

**Project activities will not create structures within a 100-year flood plain.**

- h. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.

**The proposed activities will not cause flooding. There are no dams or levees in the vicinity of the Site.**

- i. Inundation by sieche, tsunami or mudflow.

**The site of the proposed removal action is located in a relatively flat, extensively developed, inland area well away from the coast. Hence, implementation of the proposed removal action will not have any impact on inundation by sieche, tsunami, or mudflow.**

In addition, the following are addressed to meet the requirements set forth under Section 711.4, Fish and Game Code and 753.5, Title 14, Code of California Regulations relating to filing of environmental fees:

- Changes to riparian land, rivers, streams, watercourses and wetlands under state and federal jurisdiction.

**The project will not result in any changes to riparian land, rivers, streams, watercourses and wetlands under state and federal jurisdiction.**

- Changes to any water resources that will individually or cumulatively result in a loss of biological diversity among the plants and animals residing in that water.

**There will be no changes to any water resources that will individually or cumulatively result in a loss of biological diversity.**

*References:* 5, 6, 7, and 8.

*Findings of Significance:*

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

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## **9. Land Use and Planning**

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*Project activities likely to create an impact:* **No project activities will create an impact.**

*Explanation:* **Project implementation will not require a local land use decision nor change the current zoning or land uses of the property. Therefore no further analysis is necessary.**

References: 8 and 9.

*Findings of Significance:*

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

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**10. Mineral Resources**

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*Project activities likely to create an impact:* **No project activities will create an impact.**

*Description of Environmental Setting:* **Regional geologic maps indicate that Recent age fluvial sediments, consisting of fine- to coarse-grained sand and pebble to boulder gravels with occasional lenses of clay, underlie the Site. The Recent sediments in the near vicinity of the Site range in thickness from 50 to 100 feet and are underlain by Miocene age, marine sediments of the Puente Formation.**

**Site-specific subsurface investigations have encountered fill soils from the ground surface to depths ranging from 3 to over 10 feet. The fill soils consist of sand, gravel, silt and clay, and contain minor amounts of brick, wood and asphalt fragments. The fill soils are underlain by fluvial deposits. The fluvial materials, in general, are separated into an upper unit of sand and a lower unit of sand and gravel. The upper sand is fine- to coarse-grained with some silt layers, a trace of pebble gravel, and a thickness ranging between 5 to 22 feet. The lower unit of sand and gravel contains fine- to coarse-grained sands and pebble to cobble gravel.**

*Analysis of Potential Impacts:*

Describe to what extent project activities would:

- a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

**No known mineral deposits have ever been recorded at the Site, nor were any found during remedial investigation sampling undertaken at the Site. Hence, the proposed remediation program will not remove or affect any known mineral resources.**

- b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

**The proposed remediation program will not result in the loss of availability of any locally important mineral resource recovery sites.**

*References:* 5 and 8.

*Findings of Significance:*

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

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## **11. Noise**

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*Project activities likely to create an impact:* **Excavation of contaminated soil, backfilling the resulting depression, abandonment of two existing groundwater monitoring wells and construction of two new groundwater monitoring wells.**

*Description of Environmental Setting:* **The Site is located in a heavily urbanized area. Only 47 residents are recorded within a quarter mile radius of the Site. The Site is bordered to the north by the Macy Street overpass and the MTA bus maintenance facility beyond that. The Site is bordered to the south by the 101 Freeway overpass and industrial developments beyond that. The Site is bordered to the east by the MTA right-of-way and Los Angeles River and by industrial developments beyond that. The Site is bordered to the west by the Piper Technical Center. This is a multi-story structure with no windows on the side facing the Site. The roof of the Piper Technical Center is used as a landing pad by police helicopters.**

**Current noise in the vicinity of the Site is attributable to several different sources, which include fixed (constant) noise and short duration noise. The fixed noise sources include motor vehicle traffic on the 101 Freeway overpass, the Macy Street overpass and Keller Street, police department helicopter traffic at Piper Technical Center and railroad traffic on the MTA right-of-way. Short duration or infrequent noise sources include emergency vehicle sirens, construction activities and various community activities.**

**Noise due to construction or repair work is regulated as provided by Section 41.40 of the City of Los Angeles Municipal Code. No person shall between the hours of 9:00 pm and 7:00 am of the following day, perform any construction or repair work of any kind upon or any excavating for, any building or structure, where any of the foregoing entails the use of any power driven drill,**

riveting machine, excavator or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling hotel or apartment or other place of residence. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited during the hours specified. Any noise above 85 decibels average (dBA) at the Exclusion Zone perimeter for mobile equipment will be considered a noise source. (County of Los Angeles Code, Title 12 Environmental Protection, Chapter 12.08 Noise Control, Section 440, Construction noise, 2001).

*Analysis of Potential Impacts:*

Describe to what extent project activities would:

- a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

**Noise levels for remediation equipment anticipated for the Site, measured at a distance of 50 feet from the source, are as follows (Bolt, Beranek and Newman, 1971):**

▪ Truck	91 dBA
▪ Crane	83 dBA
▪ Roller	89 dBA
▪ Bulldozer	80 dBA
▪ Pickup Truck	60 dBA
▪ Backhoe	85 dBA
▪ Jack Hammer	88 dBA
▪ Rock Drill	98 dBA
▪ Pneumatic Tool	86 dBA

Noise monitoring will be conducted with a sound level meter as discussed in County of Los Angeles Code, Title 12 Environmental Protection, Chapter 12.08 Noise Control, Section 340, Sound Level Meter, 2001. The sound level meter will satisfy the requirements pertinent for Type S2A meters in the American National Standards Institute (ANSI) specifications for sound level meters, S1.4-1971, or the most recent version thereof. Monitoring will occur within the Exclusion Zone and at the perimeters of the Exclusion Zone, Decontamination Zone, Support Zone and the Site. The monitoring frequency will be determined according to the type and location of operations.

A Noise Control Plan identifying noise sources and receptors, identifying monitoring methods, providing worker hearing protection requirements, and providing control methods will be implemented. Manufacturer specifications will be reviewed for noise levels produced by any onsite equipment. If necessary, mufflers or alternative equipment may be selected to minimize noise levels.

In addition, the following control measures will be used as necessary to ensure that impacts from noise will be less than significant:

- Sound barriers will be placed around the work area.
- Alternate low-noise-generating equipment will be used.
- Mufflers will be used on selected equipment.
- Operation times will be modified.
- Work area will be expanded such that noise levels will be below 85 dBA at the perimeter.
- Reduce construction vehicle speed.
- Route construction-related traffic away from noise-sensitive areas.

- b. Exposure of persons to or generation of excessive groundbourne vibration or groundbourne noise levels.

**Use of the remediation equipment is not expected to result in exposure of persons to or generation of excessive groundbourne noise levels.**

- c. A substantial permanent increase in ambient noise levels in the vicinity above levels existing without the project.

**The project activities are temporary and will not create a permanent increase in noise levels.**

- d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

**Potential noise receptors include onsite workers, pedestrians and vehicle drivers adjacent to the Site. However, other than onsite workers, receptors are not anticipated to be significantly impacted by noise from this project. Keller Street dead-ends at the northern end of the Site. Hence, vehicle and pedestrian traffic adjacent to the Site on Keller Street is limited to employees arriving and leaving the Piper Technical Center. Onsite workers will be required to have appropriate hearing protection at all times within the Exclusion Zone. Workers shall be enrolled in a hearing conservation program that meets the requirements of CCR, Title 8, Section 5097.**

*References:* 1, 3, and 8.

*Findings of Significance:*

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

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## 12. Population and Housing

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*Project activities likely to create an impact:* **No project activities will create an impact.**

*Explanation:* **The proposed project involves remediation of contaminated soil. The anticipated duration of the project is 3 months. The Site is currently zoned as "M3-1" (heavy industry). Implementation of the project will not include population growth or displacement in the areas. For these reasons, no further analysis is necessary.**

*References:* 8 and 9.

*Findings of Significance:*

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

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## 13. Public Services

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*Project activities likely to create an impact:* **No project activities will create an impact.**

*Description of Environmental Setting:* **The County of Los Angeles and the City of Los Angeles provide Public Services and facilities in the Site area. The public services provided include sewer service, water supply, storm drains, electricity, gas, telephone, fire protection, police protection, schools and refuse collection.**

*Analysis of Potential Impacts:*

Describe to what extent project activities would:

a. Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:

- Fire protection
- Police protection
- Schools
- Parks
- Other public facilities

**The project activities will not require, involve or result in a change in the need for, or availability of, public services. Although the LAPD salvage lot located on the south end of the Site will have to be relocated during performance of the project, this will not result in any impact to police protection services.**

*References:* 8.

*Findings of Significance:*

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

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## **14. Recreation**

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*Project activities likely to create an impact:* **No project activities will create an impact.**

*Description of Environmental Setting:* **The Site is located in an area zoned as “M3-1” (heavy industrial). The southern portion of the Site, which is paved and fenced, is leased to the LAPD. The LAPD uses this area for a police car salvage lot and parts storage area. The remaining portion of the Site, which is also paved and fenced, is currently vacant. In the past few years it has been used by Caltrans as a materials laydown area for bridge retrofit work on the adjacent Santa Ana Freeway and RTD busway overpass and Cesar E. Chavez Avenue overpass.**

**The north side of the Site is bordered by the Cesar E. Chavez Avenue overpass. The south side of the Site is bordered by the Santa Ana Freeway and RTD busway overpass. The east side of the Site is bordered by the Los Angeles River. The riverbed has been channelized and paved with**

concrete in this area to improve is primary function as a flood control channel. The west side of the Site is bordered by Keller Street. The City of Los Angeles Piper Technical Center is located on the opposite side of Keller Street. This is a multi-story brick and concrete building used to support various city maintenance activities. The LAPD uses the roof of the building for helicopter operations. There are no windows in the side of the building facing the Site. Keller Street is not a through street, dead-ending at the north end of the Site. Hence, traffic on Keller Street is limited to employee and vendor vehicles associated with Piper Technical Center.

*Analysis of Potential Impacts:*

Describe to what extent project activities would:

- a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

**Project activities will have no impact on parks or recreational facilities.**

- b. Include recreational facilities or require construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

**Project activities will not require the construction of any new recreational facilities.**

*References:* 8.

*Findings of Significance:*

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

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**15. Transportation and Traffic**

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*Project activities likely to create an impact:* **Traffic generated by workers traveling to and from the Site. Transport (removal) of contaminated soil and import of clean fill material.**

*Description of Environmental Setting:* **Transportation in the Site area is in the form of vehicular traffic, rail service and air service (i.e., primarily the LAPD helicopters based out of Piper**

Technical Center). Vehicular traffic to and from the Site is limited to Keller Street, which is not a through street (i.e., it dead-ends at the north end of the Site). Existing traffic on Keller Street is limited to employee and vendor vehicles associated with Piper Technical Center. Entrance ramps to the 101 Freeway are located less than 2000 feet from the Site. The 101 Freeway is connected to a network of major Interstate freeways.

The route that most vehicles will take from the Site is as follows: exit the Site on Keller Street and proceed south, turn right on Ramirez Street, turn left on Center Street, then turn right on Commercial Street to the 101 Freeway onramp. None of these intersections is signalized, therefore level of service data do not exist. The roads in question are two-lane facilities which are moderately traveled and do not require signalization. Most vehicles traveling to the facility will take a reverse similar route.

*Analysis of Potential Impacts:*

Waste materials will be handled by personnel and equipment in strict compliance with all federal, State, and local regulations, statutes, and ordinances. The hauling contractor(s) used to transport contaminated soil and debris to the offsite thermal treatment facility will be fully licensed and permitted by the EPA and the State of California. Contractors shall comply with the City Truck Route Ordinance and use City-approved truck routes.

Describe to what extent project activities would:

- a. Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections).

**At the peak of project activities the traffic impact will be approximately 12 passenger vehicles for Site workers and those overseeing the work. Adequate parking is available onsite to accommodate these vehicles. During removal of contaminated soil offsite to the treatment facility, truck traffic is expected to peak at 16 trucks per day. This is not substantial in relation to the current vehicular traffic in the area. On trips to the Former Macy Street Site the haul trucks will be loaded with clean import soil to be used for backfilling the excavations. Hence, importing clean fill material will not result in any additional truck trips.**

**Traffic related to this project will not have an adverse effect on existing traffic load, or capacity of the street system. Project-related transportation will be subject to a waste transportation permit issued by the City of Los Angeles,**

- b. Exceed, either individually or cumulatively, a level of service standard established by the country congestion management agency for designated roads or highway.

**Traffic control measures will be implemented during performance of the removal action. Traffic control for the Site shall conform to the ordinances and regulations of the jurisdictional agency having authority over traffic control and shall conform to the latest edition of the Building News Incorporated *Work Area Traffic Control Handbook*, 2001. As shown on the attached Figures 5.1 and 5.2, all truck staging, loading, decontamination and tarping will be performed on the Site. See response to Subsection A above.**

- c. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

**There will be no substantial increase in hazards due to design features or incompatible uses. Traffic flow patterns will be coordinated to ensure safe flow of traffic along Keller Street. Priority will be given to traffic entering and exiting Piper Technical Center. These traffic flow patterns will be established through portable traffic signs and/or flagmen posted at the Site entrance and exit.**

- d. Result in inadequate emergency access.

**The project will not cause any restriction to emergency access,**

- e. Result in inadequate parking capacity.

**Adequate parking is available onsite for the remediation workers.**

- f. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).

**The project will not conflict with alternative transportation programs.**

*References:* 8.

*Findings of Significance:*

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

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**16. Utilities and Service Systems**

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*Project activities likely to create an impact.* **No project activities will create an impact.**

*Description of Environmental Setting:* **The County of Los Angeles and the City of Los Angeles provide Public Services and facilities in the Site area. The public services provided include sewer service, water supply, storm drains, electricity, gas, telephone and refuse collection.**

*Analysis of Potential Impacts:*

Describe to what extent project activities would:

- a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.

**Project activities will not affect wastewater treatment requirements. The only wastewater to be generated will consist of equipment decontamination fluids and sanitary sewage. The decontamination fluids will be contained in a portable tank and taken offsite for disposal at an appropriately licensed disposal facility. Sanitary sewage will be managed in portable toilets until it is taken offsite for disposal.**

- b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

**See response to Subsection A above.**

- c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

**Measures will be taken during the project activities to control any storm water onsite. Upon completion of the project activities drainage conditions at the Site will be restored to those that existed prior to the project. Hence, there will be no impacts on the storm water drainage system.**

- d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed.

**Potable water will be used during the project for dust control and moisture conditioning of clean fill soils. It will be obtained from fire hydrants adjacent to the Site under a temporary**

**permit from the Los Angeles Department of Water and Power (LADWP). There will be no permanent demands on the water supply system.**

- e. Result in determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

**The wastewater will be taken offsite for disposal.**

- f. Be served by a landfill with sufficient permitted capacity to accommodate the projects solid waste disposal needs.

**Relatively little solid waste (e.g., uncontaminated asphalt pavement, concrete foundations) will be generated that will require disposal in municipal solid waste landfills. Existing solid waste landfills serving the Site area have sufficient capacity for disposal of these materials.**

**Soils exceeding the removal and cleanup goals will be excavated and transported to an offsite low temperature thermal desorption unit (TDU). This facility will be fully permitted to process TRPH and PAH contaminated soils. Excavated soils received by the facility will be sampled by the facility in accordance with its operating permit prior to treatment. Upon acceptance, the contaminated soils will be processed through the TDU. Once processed, the soils will be analyzed for conformance with the cleanup standards required under the facility's operating permit.**

- g. Comply with federal, state, and local statutes and regulations related to solid waste.

**The project activities will comply with all federal, state and local regulations that pertain to solid waste disposal. Soils exceeding the removal and cleanup goals will be excavated and transported to an offsite low temperature thermal desorption unit (TDU). This facility will be fully permitted to process TRPH and PAH contaminated soils. Excavated soils received by the facility will be sampled by the facility in accordance with its operating permit prior to treatment. Upon acceptance, the contaminated soils will be processed through the TDU. Once processed, the soils will be analyzed for conformance with the cleanup standards required under the facility's operating permit.**

- h. Affect other utilities and service systems.

**Portable generators will provide any electricity required by the project activities. Cellular telephones will be used for communications. Hence, there will be no impacts on the electrical or telephone supply systems. No natural gas will be used in Site activities. Prior**

**to commencing excavation activities, all utilities will be marked to avoid accidental disruption of services.**

References: 8.

Findings of Significance:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

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## 17. Cumulative Effects

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*Project activities likely to create an impact.* **Project activities will not have a cumulative impact.**

*Description of Environmental Setting.* **The Site is located in an area zoned as “M3-1” (heavy industrial). The southern portion of the Site, which is paved and fenced, is leased to the LAPD. The LAPD uses this area for a police car salvage lot and parts storage area. The remaining portion of the Site, which is also paved and fenced, is currently vacant. In the past few years it has been used by Caltrans as a materials laydown area for bridge retrofit work on the adjacent Santa Ana Freeway and RTD busway overpass and Cesar E. Chavez Avenue overpass.**

**The remediation project will require approximately 75 to 90 days to complete. Upon completion, the contamination in the upper 10 feet of Site soils will have been remediated and the Site conditions returned to those similar to what existed prior to the project.**

*Analysis of Potential Impacts:*

Describe to what extent project activities would:

- a. Increase the need for developing new technologies, especially for managing any hazardous or non-hazardous wastes that the project generates.

**Project activities will generate waste materials, which will be managed, treated and/or disposed of offsite at appropriately licensed facilities in accordance with federal, state and local regulations. No new technologies will need to be developed in order to carry out the project.**

- b. Increase the need for developing new technologies for any other aspects of the projects.

**No aspect of the project will increase the need for developing new technologies.**

- c. Leads to a larger project or leads to a series of projects, or is a step to additional projects. Examples of DTSC projects include Interim Corrective Measures and Removal Actions that are not final remedies for a site or facility.

**Groundwater investigations are being performed separately from the soil remediation. This separation was undertaken to expedite cleanup of the property, and return the land to beneficial use. The need to initiate additional onsite groundwater investigations to determine the limits of PAHs and LNAPL will be based on the results of the quarterly onsite groundwater monitoring by BNSF and offsite groundwater investigations and monitoring by others. The Gas Company is planning to perform a groundwater investigation around the Piper Technical Center located northwest of the Site, across Keller Street, in the upgradient groundwater flow direction. This upgradient investigation will provide important information in assessing contaminant sources and impacts. DTSC will comply with CEQA for any remedial activities proposed as a result of the groundwater investigations.**

- d. Alters the location, distribution, density or growth rate of the human population of an area.

**The project activities will not impact population growth.**

- e. Affect existing housing, public services, public infrastructure, or create demands for additional housing.

**The project activities will not require any additional housing, public services or public infrastructure.**

- f. Be cumulatively considerable on the environments with cumulative adverse effects on air, water, habitats, natural resources, etc.

**The project will not have a considerable adverse effect on air or traffic. The project will not impact water, habitat or natural resources.**

*References: 7 and 8.*

*Findings of Significance:*

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

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**18. Mandatory Findings of Significance**

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*Project activities likely to create an impact.* **Excavation and removal of contaminated soils in the upper 10 feet of portions of the Site.**

*Description of Environmental Setting:* **The Site is located in an area zoned as “M3-1” (heavy industrial). The southern portion of the Site, which is paved and fenced, is leased to the LAPD. The LAPD uses this area for a police car salvage lot and parts storage area. The remaining portion of the Site, which is also paved and fenced, is currently vacant. In the past few years it has been used by Caltrans as a materials laydown area for bridge retrofit work on the adjacent Santa Ana Freeway and RTD busway overpass and Cesar E. Chavez Avenue overpass.**

**The remediation project will require approximately 75 to 90 days to complete. Upon completion, the contamination in the upper 10 feet of Site soils will have been remediated and the Site conditions returned to those similar to what existed prior to the project.**

*Analysis of Potential Impacts:*

Describe to what extent the project would:

- a. Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

**Project activities will not degrade the quality of the environment, or cause any substantial adverse effect on human beings or the environment. No plant or animal life will be affected. No historical or archeological significant buildings will be impacted.**

- b. Have impacts that are individually limited but cumulatively considerable. As used in the subsection, "cumulatively considerable".

["Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects]

**The project activities will not have impacts that are cumulatively considerable.**

- c. Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly.

**There will be a minimal amount of air emissions generated by the project activities but they will be below threshold levels allowed by SCAQMD. There will be noise generated from project activities, but it will be short term (i.e., 75 to 90 days) and intermittent.**

*References:* 1 through 9.

*Findings of Significance:*

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

#### V. DETERMINATION OF DE MINIMIS IMPACT FINDING

On the basis of this Special Initial Study:

- I find that there is no evidence before the Department of Toxic Substances Control that the proposed project will have a potential for an adverse effect on wildlife resources or the habitat upon which the wildlife depend. A Negative Declaration with a De Minimis Impact Finding will be prepared.

#### VI. DETERMINATION OF APPROPRIATE ENVIRONMENTAL DOCUMENT

On the basis of this Special Initial Study:

- I find that the proposed project COULD NOT have a significant effect on the environment. A NEGATIVE DECLARATION will be prepared.

- ❑ I find that although the proposed project COULD HAVE a significant effect on the environment, mitigation measures have been added to the project that would reduce these effects to less than significant levels. A NEGATIVE DECLARATION will be prepared.
  
- ❑ I find that the proposed project COULD HAVE a significant effect on the environment. An ENVIRONMENTAL IMPACT REPORT will be prepared.

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<b>DTSC Project Manager Signature</b>	<b>Title</b>	<b>Telephone #</b>	<b>Date</b>
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<b>DTSC Branch/ Unit Chief Signature</b>	<b>Title</b>	<b>Telephone #</b>	<b>Date</b>
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ATTACHMENT A

SPECIAL  
INITIAL STUDY  
REFERENCE LIST  
for  
(Former Macy Street Site)

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1. Bolt, Beranek and Newman, *Noise from Construction Equipment and Operations Building Equipment, and Home Appliances*. Prepared for the U.S. Environmental Protection Agency, Office of Noise Abatement and Control, Washington, D.C., 1971
2. California Division of Mines and Geology. 1997. *Fault-Rupture Hazard Zones in California, Special Publication 42*. 1997.
3. County of Los Angeles Code. 2001. *Title 12 Environmental Protection, Chapter 12.08 Noise Control, Section 440, Construction Noise*. 2001
4. South Coast Air Quality Management District. November 1993. *South Coast Air Quality Management District CEQA Air Quality Handbook*. November 1993.
5. TRC. May 1994. *Final Remedial Investigation of the Former Santa Fe Railway Company Macy Street Site*. May 1994.
6. TRC. December 1997. *Additional Remedial Investigation and Feasibility Study, Former Macy Street Site*. December 1997.
7. TRC. June 2001. *Remedial Investigation (Revised), Former Macy Street Site*. June 2001.
8. TRC. June 2002. *Removal Action Workplan, Former Macy Street Site, Los Angeles, California*. June 2002.
- 8a. TRC. March 2002. *First Quarter 2002 Ground Water Monitoring and Sampling Report, Former Macy Street Site*. March 2002.
- 8b. TRC. October 2002. *Cultural Resource Literature Review and Impact Assessment, Former Macy Street Site Remediation Project*. October 2002.
9. Claritas, Inc. October 2002. *Demographic Snapshot Report, Keller Street and Ramirez Street, 0.25-Mile Radius, Los Angeles, California*. 2002.

**TABLE 1**  
**PROPOSED SOIL CLEANUP GOALS VS. DEPTH**  
**FOR CARCINOGENS**  
**BNSF - FORMER MACY STREET SITE**

CONSTITUENT OF CONCERN (COC)	PROPOSED CLEANUP GOAL <sup>(1)</sup>		RANGE OF DETECTABLE CONSTITUENT CONCENTRATIONS ONSITE
	0 to 5 Feet Below Grade	5 to 10 Feet Below Grade	
Total Equivalent Benzo(a)Pyrene	1.7	50	0.04 to 72.0
Benzene	6.6	7,662	0.0071 to 1.6
Arsenic	41	500	1.23 to 14.0
Beryllium	23	75	0.20 to 3.9
Cadmium	477	100	0.3 to 2.3
Total Chromium	170 <sup>(2)</sup>	2,500	4.5 to 91.0
Hexavalent Chromium	170	500	<4.5 to <91
Nickel	7,856	2,000	2.9 to 36.0

(1) Proposed Cleanup Goals include calculated goals under a future industrial worker scenario (0 - 5 feet below grade) or a future construction worker scenario (5 - 10 feet below grade). Where the calculated goals exceed established hazardous waste criteria (i.e., for metals - see Table 3.1), the Total Threshold Limit Concentration (TTLC) has been specified per Title 22 CCR.

(2) Assumes all chromium is present as hexavalent chromium.

Notes:

- All entries are expressed in milligrams per kilograms (mg/kg).